

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

Hearing Date and Time:

June 10, 2024 at 10:00 a.m.

**DEBTOR'S RESERVATION OF RIGHTS TO THE
INTERIM APPLICATION FOR ALLOWANCE OF FEES
AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD OF
AUGUST 12, 2023 THROUGH MARCH 31, 2024 FILED BY OTTERBOURG**

LLT Management LLC, formerly known as LTL Management LLC,² the debtor in the above-captioned case (the “Debtor”), files this reservation of rights with respect to the Interim

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

² On December 29, 2023, LTL Management LLC changed its name to LLT Management LLC.

Application for Compensation (the “Application”) filed by Otterbourg P.C. (“Otterbourg”) for the period of August 12, 2023 through March 31, 2024 [Dkt. 1756].

PRELIMINARY STATEMENT

Otterbourg’s Application seeks payment of \$110,515.00, which includes a significant amount of non-compensable services, such as services duplicative of those of MoloLamken LLP (“MoloLamken”), the firm expressly designated as appellate counsel for the Official Committee of Talc Claimants (the “TCC”). The Debtor continues to have concerns regarding the TCC’s provision of appellate services, particularly given the retention of MoloLamken and the similar services performed by each professional retained by the TCC (collectively, the “TCC Professionals”), which the Debtor continues to believe could be reasonably performed by MoloLamken alone.

Since the filing of the Interim Application for Compensation filed by Genova Burns LLC for the period of August 12, 2023 through January 31, 2024 [Dkt. 1718], the TCC Professionals have filed additional interim fee applications. See Dkts. 1719, 1744. The Debtor wishes to reserve its rights with respect to the Application pending the filing of additional interim fee applications by the remaining TCC Professionals in the Chapter 11 Case.

RESERVATION OF RIGHTS

1. The Debtor expressly reserves all rights, claims, defenses and remedies with respect to Otterbourg’s Application.
2. Further, if the Application is granted by the Court, the Debtor reserves all of its rights to object to any fees and expenses incurred by Otterbourg in connection with this Chapter 11 Case, including, but not limited to, on the basis of reasonableness and duplication of effort.
3. The Debtor reserves the right to modify or supplement this reservation of rights up to the date of the hearing and file a response to a reply by Otterbourg, if any.

CONCLUSION

WHEREFORE, the Debtor respectfully requests this Court grant such other and further relief to the Debtor as the Court deems just and proper.

Dated: May 28, 2024

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

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